



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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Transmitted via email

August 20, 2014

Ms. Karen C. Saucier, PhD  
Project Coordinator  
TRC Environmental Corporation  
30 Patewood Plaza One  
Greenville, South Carolina 29615

RE: Additional Wetland Delineation Results  
Dayco/L.E. Carpenter Superfund Site, Borough of Wharton, New Jersey

Dear Karen:

After careful review of historical monitoring data, results from the July 2013 well point sampling effort (presented in Progress Report 39, September 10, 2013) and TRC Environmental Corporation's (TRC's) responses to our comments on the July 2013 wetland delineation sampling results (letter dated February 11, 2014), the United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) maintain the assertion that delineation of residual contamination in the wetland area has not been completed. EPA and NJDEP comments on TRC's February 11, 2014 response letter are attached.

While the timing of the July 2013 well point sampling provided an opportunity to establish a baseline for contaminant levels in the wetland area for the purpose of evaluating the effectiveness of the phytoremediation pilot, this was not its primary purpose. The primary purpose of the sampling effort was to fully delineate the vertical and horizontal extent of the residual contamination in the wetland area. This goal has not yet been achieved. In addition, based upon the levels of contaminants detected in the sediments and surface water in the Rockaway River, EPA and NJDEP have determined that a comprehensive sampling effort to identify the potential for contaminant migration from the wetland area into the river should also be implemented. Therefore, a work plan should be developed to complete the delineation and characterization of the residual contamination in the wetland area and identify any current or potential impacts of this contamination to the Rockaway River. Previous EPA and NJDEP comments on the results of the well point sampling results, as well as the attached comments should be considered in development of the work plan.

In order to preserve the integrity of the phytoremediation pilot, additional sampling in the wetland area may be conducted after the study is completed. However, sampling associated with the Rockaway River should not impact the pilot and may therefore be conducted concurrent to the pilot.

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Please contact me at (212)637-3865 or at pierre.patricia@epa.gov so that we may schedule a conference call to provide TRC, NJDEP and EPA the opportunity to discuss the attached comments and solidify a plan for moving forward with this effort.

Sincerely,

  
Patricia Simmons-Pierre  
Remedial Project Manager

Attachment

cc: Ernie Schaub, PolyOne Corporation (via email)  
Anthony Cinque, NJDEP (via email)  
Rob Alvey, EPA (via email)  
Michael Clemetson, EPA (via email)

**DAYCO CORP./L.E. CARPENTER SITE ADDITIONAL WETLAND DELINEATION RESULTS**  
**EPA and NJDEP COMMENTS on TRC's RESPONSE LETTER, dated February 11, 2014**

**Response to Comment 1:** While the timing of the well point sampling provided an opportunity to establish a baseline for conditions in the wetland area for the purpose of evaluating the effectiveness of the phytoremediation pilot, this was not its primary purpose. The primary purpose of the sampling effort was to *fully delineate the vertical and horizontal extent of the residual contamination in the wetland area*. The completion of the sampling outlined in the approved work plan is necessary to achieve this goal.

**Response to Comment 2:** The purpose of installing a temporary well point adjacent to MW-35 was to vertically delineate contamination, identify the "contaminant-contributing zone(s)" and target this zone(s) in subsequent sampling, *and* to provide a comparison of groundwater results from an established, properly constructed and developed monitoring well against groundwater samples from the temporary well point.

With regard to sample turbidity, labs test groundwater samples for turbidity before analysis. If the test fails, the samples are filtered before analysis. If not, the samples are analyzed without further filtering. Further, it has been observed at many sites that sampling results can vary greatly between sampling rounds due to factors such as seasonality, changes in ground water levels, etc. This has been observed at the L.E. Carpenter site. Therefore, the agencies regard the sampling results from TW-35-5 as representative.

**Response to Comment 3:** Sampling results indicate that horizontal and vertical delineation of groundwater contamination in the wetland area remains incomplete. Delineation should be completed at all previously approved locations and any subsequent delineation must also profile sample each well to identify the contaminant contributing zone(s) so that subsequent groundwater sampling targets this zone.

In addition, pore water sample PW-R-3 collected from the banks of the Rockaway River showed DEHP at 50 ppb, more than two (2) orders of magnitude above the FW2 NJ SWQC Ecological Screening Criteria (ESC) of 0.003 ppb. Sediment collected from this same location showed DEHP at 400 ppm. The NJDEP ESC (Lowest Effects Level) for DEHP is 0.182 ppm and (for comparison) the Severe Effects Level (SEL) is 0.750 ppm. Therefore, additional pore water and sediment sampling is necessary to delineate potential impacts to the river and associated wetlands.

The technical basis for evaluating groundwater and pore water data against FW2 SWQC can be found in Section 6.2.2 of NJDEP's August 2011 *Ecological Evaluation Technical Guidance*, [http://www.nj.gov/dep/srp/guidance/srra/ecological\\_evaluation.pdf](http://www.nj.gov/dep/srp/guidance/srra/ecological_evaluation.pdf).